

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**
Plaintiff,

v.

**ONEPLUS TECHNOLOGY
(SHENZHEN) CO., LTD.,**
Defendant.

**CIVIL ACTION NO. 6:20-cv-00952-ADA
CIVIL ACTION NO. 6:20-cv-00953-ADA
CIVIL ACTION NO. 6:20-cv-00956-ADA
CIVIL ACTION NO. 6:20-cv-00957-ADA
CIVIL ACTION NO. 6:20-cv-00958-ADA**

JOINT MOTION TO STAY ALL DEADLINES

On April 27, 2023, Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“OnePlus”) (collectively, “Parties”), filed a Joint Notice of Settlement and Motion to Stay All Deadlines. Dkt. 136.¹ On April 28, 2023, the Court granted the Parties’ motion and stayed all deadlines until May 26, 2023. *See* April 28, 2023 Text Order.

A settlement in principle has been reached to resolve all matters in controversy asserted by Brazos’s Complaints (Dkt. 1 in Case Nos. 6:20-cv-00952, -00953, -00956, -00957, -00958) and OnePlus’s Counterclaims (Case No. 6:20-cv-00952, Dkt. 29; Case No. 6:20-cv-00953, Dkt. 28; Case No. 6:20-cv-00956, Dkt. 29; Case No. 6:20-cv-00957, Dkt. 28; Case No. 6:20-cv-00958, Dkt. 28). Accordingly, the Parties request a further stay of all deadlines to allow for negotiations to be finalized and the Parties to submit a motion to dismiss all claims and counterclaims at issue.

¹ Unless otherwise noted, all “Dkt. ___” citations refer to Case No. 6:20-cv-00952.

The Parties expect to file dismissal papers within thirty (30) days and further agree that, at the end of the stay, they shall file a joint notice advising the Court of any appropriate relief required, including whether the stay should or should not be continued.

In light of this settlement and impending dismissal, the Parties respectfully request the Court stay all impending deadlines until June 26, 2023.

Dated: May 26, 2023

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop
Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)
jwaldrop@kasowitz.com
Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)
djones@kasowitz.com
Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)
mbarber@kasowitz.com
John W. Downing (CA Bar No. 252850)
(Admitted in this District)
jdowning@kasowitz.com
Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
ThucMinh Nguyen (CA Bar No. 304382)
(Admitted in this District)
tnguyen@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5171

Paul G. Williams (GA Bar No. 764925)
(Admitted in this District)
pwilliams@kasowitz.com
KASOWITZ BENSON TORRES LLP
1230 Peachtree Street N.E., Suite 2445
Atlanta, Georgia 30309
Telephone: (404) 260-6080
Facsimile: (404) 260-6081

Howard L. Bressler (NY Bar No. 2487379)
(Admitted *pro hac vice*)
hbressler@kasowitz.com
Joshua A. Whitehill (NY Bar No. 4766473)
(Admitted *pro hac vice*)
jwhitehill@kasowitz.com
Noah P. Dorman (DC Bar No. 1779821)
(Admitted *pro hac vice*)
ndorman@kasowitz.com
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, NY 10019
Telephone: (212) 506-1700
Facsimile: (212) 506-1800

Mark D. Siegmund (TX Bar No. 24117055)
msiegmund@cjsjlaw.com
Craig D. Cherry (TX Bar No. 24012419)
ccherry@cjsjlaw.com
Gregory P. Love (TX Bar No. 24013060)
glove@cjsjlaw.com
Justin W. Allen (TX Bar No. 24081977)
justin@cjsjlaw.com
Melissa S. Ruiz (TX Bar No. 24128097)
mruiz@cjsjlaw.com
**CHERRY JOHNSON SIEGMUND JAMES
PLLC**
The Roosevelt Tower
400 Austin Avenue, 9th Floor
Waco, Texas 76701
Telephone: (254) 732-2242

***Attorneys for Plaintiff
WSOU Investments, LLC d/b/a Brazos
Licensing and Development***

By: /s/ Michael J. Lyons
Michael J. Lyons*
California Bar No. 202284
michael.lyons@morganlewis.com
Ahren C. Hsu-Hoffman
Texas Bar No. 24053269
Ahren.hsu-hoffman@morganlewis.com
Jacob J.O. Minne*
California Bar No. 294570
jacob.minne@morganlewis.com

Austin L. Zuck*
California Bar No. 318434
austin.zuck@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
1400 Page Mill Road
Palo Alto, CA 94304
T: 650.843.4000
F: 650.843.4001

Elizabeth M. Chiaviello
Texas Bar. No. 24088913
elizabeth.chiaviello@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
1717 Main Street, Suite 3200
Dallas, TX 75201
T: 214.466.4000
F: 214.466.4001

*Admitted *pro hac vice*

Attorneys for Defendant
OnePlus Technology (Shenzhen) Co. Ltd

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record on this 26th day of May, 2023, via the Court's CM/ECF System.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop